

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>GREGORY COX</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>TAKIYAH WOODARD</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to pass counterfeit currency - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 472 (passing counterfeit currency - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 472 (possessing counterfeit currency - 1 count)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

In or about May 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendants

**GREGORY COX and  
TAKIYAH WOODARD**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, knowingly passing counterfeit currency with the intent to defraud, in violation of Title 18, United States Code, Section 472.

**MANNER AND MEANS**

It was part of the conspiracy that:

1. Defendants GREGORY COX and TAKIYAH WOODARD exploited WOODARD's position as a sales associate at a Wal-Mart store located on Roosevelt Boulevard in Philadelphia, Pennsylvania ("the Wal-Mart store") to pass counterfeit United States currency

at that Wal-Mart store.

2. Defendants GREGORY COX and TAKIYAH WOODARD used \$1,000 in counterfeit and altered \$100 Federal Reserve Notes (“FRNs”) to purchase a laptop computer from the Wal-Mart store.

### **OVERT ACTS**

In furtherance of the conspiracy, the following overt acts, among others, were committed on or about May 3, 2007, in the Eastern District of Pennsylvania:

1. Defendant GREGORY COX called defendant TAKIYAH WOODARD while she was working at the Wal-Mart store, and told her that he wanted to purchase a laptop computer from the store using counterfeit United States currency. Defendant WOODARD agreed to assist defendant COX make the purchase.

2. Defendant GREGORY COX drove to the Wal-Mart Store and went inside to meet with defendant TAKIYAH WOODARD.

3. Defendants GREGORY COX and TAKIYAH WOODARD walked to the electronics department and picked out the laptop computer that defendant COX intended to purchase using counterfeit United States currency.

4. Defendant GREGORY COX asked defendant TAKIYAH WOODARD where they could pay for the laptop computer without raising suspicion that they were paying for the computer using counterfeit United States currency.

5. Defendants GREGORY COX and TAKIYAH WOODARD took the laptop computer to a sales associate working in the sporting goods department, identified here as person #1, an unindicted co-conspirator and adult male known to the grand jury. Person #1 had

previously allowed defendants COX and WOODARD purchase merchandise using counterfeit United States currency.

6. Defendant GREGORY COX purchased the laptop computer using ten counterfeit \$100 Federal Reserve Notes.

7. Defendant GREGORY COX subsequently paid person #1 \$300 in counterfeit United States currency for helping him purchase the laptop computer.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 3, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**GREGORY COX and  
TAKIYAH WOODARD,**

with intent to defraud, passed, uttered and published, and aided and abetted the passing, uttering and publishing of, counterfeit obligations of the United States, that is, ten counterfeit \$100 Federal Reserve Notes, at a Wal-Mart store.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 23, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**GREGORY COX,**

with intent to defraud, possessed and concealed falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$20,000 in counterfeit Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

**A TRUE BILL:**

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**FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**